

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Cr. No. 05-1849 JH

ADRIAN SANFORD,

Defendant.

**UNOPPOSED MOTION TO REMOVE
DEFENDANT FROM PRETRIAL SUPERVISION**

COMES NOW the Defendant, Adrian Sanford, by and through his counsel of record, Robert R. Cooper, and respectfully requests that this Court enter an Order amending the conditions of Mr. Sanford's release to no longer require that he report to pretrial services. As grounds, Counsel states:

1. Mr. Sanford was charged as a co-defendant in a four-count Indictment filed with this Court on August 23, 2005 and as a co-defendant in a four-count Superseding Indictment filed with this Court on April 25, 2006.

2. The conditions of Mr. Sanford's release were set on December 15, 2005 by Magistrate Judge Jacqueline Marshall of the United States District Court in the District of Arizona. The conditions of release imposed by Magistrate Judge Marshall were subsequently adopted by Magistrate Judge Don J. Svet of the District of New Mexico.

3. Among the conditions of Mr. Sanford's release is the condition that Mr. Sanford report to Pretrial Services in Arizona, where he resides, on a regular basis.

4. Mr. Sanford has been on pretrial supervision for approximately five (5) years.

During this period, Mr. Sanford has continued to comply with all of the mandates of the Court without issue.

5. As a result of Mr. Sanford's continued and consistent compliance with the requirements of Pretrial Services and with the conditions of release imposed by the Court, his Pretrial Supervisor in Arizona has reduced the frequency of his required visits to once every other month and has conveyed this information to United States Probation Officer (USPO) George Rodriguez in New Mexico.

6. Mr. Sanford's commendable behavior over these five (5) years has demonstrated that Mr. Sanford is fully committed to compliance with all of the Court's orders and that he is a good candidate for removal from Pretrial Supervision.

7. USPO George Rodriguez has indicated that he does not oppose this motion.

8. Assistant United States Attorney James Braun has also indicated that he does not oppose this motion.

WHEREFORE, for the aforementioned reasons, Mr. Sanford respectfully moves this Court for an Order removing him from Pretrial Supervision.

Electronically Submitted,

The Law Offices of Robert R. Cooper

/s/ Robert R. Cooper

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CERTIFICATE OF SERVICE

I hereby certify that on December 7, 2010, I filed the foregoing electronically through the CM/ECF system, which caused all parties of record or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

/s/ Robert R. Cooper
ROBERT R. COOPER